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May 11, 2020

VIA ECF

Honorable Denise L. Cote  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: Securities and Exchange Commission v. International Investment Group LLC--  
19-cv-10796 (DLC) (S.D.N.Y)

Dear Judge Cote:

We represent non-parties IIG Global Trade Finance Fund Ltd. ("GTFF") and IIG Structured Trade Finance Fund Ltd. ("STFF") in the action captioned above.

We write in response to the letter submitted on May 8, 2020 by Constance Boland, counsel to Girobank, N.V., and Girobank International, N.V. (collectively, "Girobank") requesting the opportunity to file a sur-reply to the memorandum of law and the declaration of Christopher Kennedy filed May 8, 2020 in support of the request of GTFF and STFF for an order directing certain disbursements from accounts maintained at Bank Leumi in New York [Docket Nos. 136 and 137].

GTFF and STFF recognize that, in response to the factual and legal arguments raised by Girobank in its opposition [Docket Nos. 125-127] to the original request filed by GTFF and STFF [Docket Nos. 113-114], their response raised new factual and legal issues. Accordingly, GTFF and STFF have no objection to the request made by Girobank. However, to the extent that Girobank's next submission to this Court may raise new factual and legal issues, they respectfully reserve the right to request an opportunity to file a supplemental response.

Respectfully submitted,

Stephen B. Selbst



HERRICK

cc: All counsel of record via ECF  
Christopher Kennedy  
Timothy Womack  
Max Jackson